



MARIPOSA COUNTY OFFICE OF EDUCATION

P. O. Box 8 Mariposa, CA 95338 * Phone (209) 742-0250 Fax (209) 966-4549

Robin Hopper
Superintendent

April 26, 2019

Via E-mail: eberg@dir.ca.gov

Eric Berg

Deputy Chief of Health

RE: Comment on Proposed Regulation Section 5141.1: Protection from Wildfire Smoke

Dear Deputy Chief Berg:

I am submitting the following comments both in my capacity as the Mariposa County Superintendent of Schools. While we greatly commend your agency's efforts to protect employees from the effects of wildfire smoke, we also ask that you consider the potential impact of the proposed regulations upon public schools.

Respiratory Protective Equipment

Public schools present unique working environments because of the ongoing presence of children. If our schools are required to provide employees with N95 respirators if AQI exceeds 150, they would also have to give the children respiratory devices in an effort to ward-off the same risks. We have been advised that the N95 respirators are not designed for children. If there are alternative devices specifically designed for children, schools will need more time to prepare for securing the funding and purchasing of such equipment.

MERV 13 Filters

Schools districts face a litany of statutory and regulatory requirements whenever any type of construction or modernization projects are undertaken for public school buildings. Many schools' HVAC systems will have to be upgraded for the capacity of MERV 13 filters. Designing, financing and implementing such projects could take years. We ask that you take these timing and funding logistics into consideration when formulating the final regulations.

Training

The final regulations should specify the time frames regarding training requirements, frequency, and whether the training should be provided on an ongoing basis. Again, we fully appreciate your efforts to protect California employees from the hazards of wildfire smoke. We just ask that you consider the unique circumstances of California public schools and an extended time frame in which school districts will be expected to complete full implementation.

Sincerely,

Robin Hopper
Mariposa County Superintendent of Schools

MARIPOSA COUNTY BOARD OF EDUCATION AND TRUSTEES

Kathy Chappell
District 1

Steve Bacus
District 2

Judy Eppler
District 3

Wayne Forsythe, President
District 4

Robert Collins
District 5